

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE AT CHATTANOOGA**

TERPSEHORE MARAS,

Plaintiff,

v.

CHATTANOOGA NEWS CHRONICLE,
THE HUFFINGTON POST, INC.,
REPRESENTATIVE STEVE COHEN,
US DOMINION, INC., DOMINION VOTING
SYSTEMS, INC., DOMINION VOTING
SYSTEMS CORPORATION, MEDIA
MATTERS FOR AMERICA, OHIO
INTELLIGENCE TIPS, ROSS ELDER,
and ALI ABDUL RAZAQ AKBAR A/K/A
ALI ALEXANDER

Defendants.

Civil Action No. 1:21-cv-317

DEFENDANT ELDRIDGE’S MOTION TO DISMISS PURSUANT FEDERAL RULE OF
CIVIL PROCEDURE 12.02(b)(2) FOR LACK OF PERSONAL JURISDICTION

Defendant Eldridge is listed in the above captioned case as Ross Elder. Ross Elder is a pseudonym of Rodney Eldridge. The Plaintiff also alleges that Defendant Eldridge is the author of a blog known as “Ohio Intelligence Tips”.

Defendant Eldridge was served with the Plaintiff’s amended complaint on December 3, 2021. Defendant Eldridge timely filed and served a Motion to Dismiss for Lack of Personal Jurisdiction, an Affidavit, and a Memorandum in Support of the Motion, in the Circuit Court of Hamilton County Tennessee on December 6, 2021. (Attached Exhibits A, B, C, D). Defendant

Eldridge's affidavit attests that he has never had any contact or ties with the state of Tennessee. Plaintiff did not file any responsive pleading.

A hearing was held on the Motion on December 20, 2021. Plaintiff's counsel did not appear. At that hearing, the Motion was granted and the Defendant was ordered to prepare and submit a proposed order. Defendant filed the proposed order on December 20, 2021. (Attached Exhibit E). That order was awaiting signature at the time this case was removed to Federal Court.

The removal of this case to Federal Court does not involve any facts surrounding Defendant Eldridge. Defendant Eldridge and Plaintiff both reside in Ohio. Plaintiff's claims against Defendant Eldridge, and his alleged blog, do not involve any constitutional or federal question of law. Defendant Eldridge has never had any contact with the state of Tennessee.

Therefore, since there is no personal jurisdiction as to Defendant Eldridge in this Court, or any purported blog he may have written, this case should be dismissed as to Defendant Eldridge and his alleged blog.

Certificate regarding good faith conference filed simultaneously.



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CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2022, I caused the foregoing document to be sent for filing to the Clerk at the Tennessee Federal Court 900 Georgia ave, Chattanooga, Tennessee 37402 by regular mail, 1 and the listed parties by either email or regular mail:

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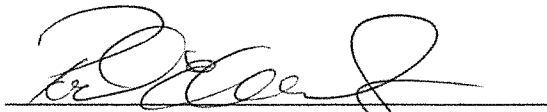
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